

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TSAKOS INC. t/a HANOVER MANOR, on  
behalf of itself and all others similarly situated,

Plaintiff,

v.

THE HANOVER INSURANCE GROUP,  
INC. and CITIZENS INSURANCE  
COMPANY OF AMERICA,

Defendants.

Civil Action No.: 2:20-cv-08889 (ES-CLW)

**DEFENDANT CITIZENS INSURANCE  
COMPANY OF AMERICA'S NOTICE OF  
MOTION FOR JUDGMENT ON THE  
PLEADINGS**

**Return Date: April 5, 2021**

**To:** Lindsey H. Taylor, Esq.  
**CARELLA, BYRNE, CECCHI  
OLSTEIN, BRODY & ANGELO**  
5 Becker Farm Road  
Roseland, New Jersey 07068  
*Attorneys for Plaintiff*

**PLEASE TAKE NOTICE** that on April 5, 2021, at 9:00 a.m., or on such date as may be directed by the Court, Defendant Citizens Insurance Company of America ("Citizens")<sup>1</sup>, by and through its attorneys, Finazzo Cossolini O'Leary Meola & Hager, LLC, shall move before the United States District Court for the District of New Jersey, Newark Vicinage, for an Order granting Citizens' Motion for Judgment on the Pleadings pursuant to Rule 12(c) of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that in support of said Motion, Citizens will rely upon the Memorandum of Law and Certification of Jeremiah L. O'Leary, Esq. (with exhibits) submitted herewith.

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<sup>1</sup> By Stipulation entered by this Court on November 19, 2020, all claims against Defendant, The Hanover Insurance Group, Inc., have been dismissed without prejudice.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is respectfully requested.

Dated: March 12, 2021

**FINAZZO COSSOLINI O'LEARY  
MEOLA & HAGER, LLC**

By: /s/ Jeremiah L. O'Leary  
JEREMIAH L. O'LEARY, ESQ.  
67 East Park Place, Suite 901  
Morristown, NJ 07960  
Tel: (973) 343-4960  
jeremiah.oleary@finazzolaw.com  
*Attorneys for Defendant*  
*Citizens Insurance Company of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of March 2021, I caused a true and complete copy of Defendant Citizens Insurance Company of America's Motion for Judgment on the Pleadings to be served on all other counsel of record through the Court's electronic case filing system addressed as follows:

Lindsey H. Taylor, Esq.  
**CARELLA, BYRNE, CECCHI  
OLSTEIN, BRODY & ANGELO**  
5 Becker Farm Road  
Roseland, New Jersey 07068  
*Attorneys for Plaintiff*

/s/ Jeremiah L. O'Leary  
JEREMIAH L. O'LEARY, ESQ.